

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DeWitt Gilmore,
Plaintiff,

v.

Sean Com**bs, et al.,**
Defendants.

Case No.: 1:24-cv-08440-JPO

**PLAINTIFF'S NOTICE OF SUPPLEMENTAL AUTHORITY
REGARDING CRIMINAL PROCEEDINGS INVOLVING
DEFENDANT SEAN COMBS**

TO THE HONORABLE COURT:

Plaintiff **DeWitt Gilmore** respectfully submits this Notice of Supplemental Authority to inform the Court of recent developments in the criminal prosecution of Defendant **Sean Combs**, which are directly relevant to the factual and legal context of this civil action.

I. RECENT DEVELOPMENTS

On or about **April 4, 2025**, the United States Attorney's Office for the Southern District of New York filed a **superseding federal indictment** against Sean Combs. This indictment includes additional charges of:

- **Sex Trafficking by Force, Fraud, or Coercion (18 U.S.C. § 1591)**, and
- **Transportation for Prostitution (18 U.S.C. § 2421)**.

According to the Department of Justice and multiple mainstream media sources, these charges arise from an expanding investigation into Mr. Combs' alleged pattern of coercive and violent behavior.

Additionally, it has been confirmed that **Casandra "Cassie" Ventura** will testify publicly under her real name in the upcoming criminal trial, scheduled to begin on **May 5, 2025**. Prosecutors have also indicated their intent to introduce **prior bad acts evidence** to establish a **pattern of sexual exploitation, abuse, and control**.

Further, Plaintiff has been interviewed by officials from the **Department of Justice and Homeland Security** in connection with their ongoing criminal investigation of Defendant Combs. This reinforces Plaintiff's role as a relevant and cooperating witness whose civil claims may align with the broader scope of alleged criminal activity.

II. RELEVANCE TO THE CIVIL CASE

Plaintiff's claims in this civil matter involve coordinated violence and coercion directed by Defendant Combs. The newly public criminal allegations significantly support:

- The **credibility and plausibility** of Plaintiff's factual claims;
- A broader **pattern of predatory and retaliatory behavior** by Defendant;
- The existence of an **organized, enterprise-like method** of abuse involving multiple actors, consistent with Plaintiff's allegations.

These developments have material relevance to Plaintiff's Opposition to Defendants' Motion to Dismiss and further establish the need for full discovery.

Plaintiff respectfully submits this Notice for the Court's awareness and consideration as the record continues to develop.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D Gilmore', with a long horizontal flourish extending to the right.

DeWitt Gilmore

Plaintiff, Pro Se

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April 8, 2025